



March 15, 2013

Ms. Wilhemina McLemore Supervisor, Detroit Field Office MDEQ, Air Quality Division Cadillac Place, Suite 2-300 3058 West Grand Boulevard Detroit, Michigan 48202-6058

Subject: Severstal Dearborn, LLC - Annual ROP Certification

Dear Ms. McLemore:

Attached is our annual ROP certification and semi-annual deviation reports for 2012.

Should you need additional information or wish to discuss this matter further, please contact me at (313) 845-3217.

Very truly yours,

James E. Earl, Manager Environmental Engineering

Attachments:

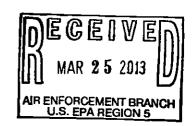
ROP Certification
January 1 – June 30, 2012 Deviation Report
July 1 – December 31, 2012 Deviation Report

cc: USEPA, Region 5



a Bak ag magas ng pang. Tang sa magas





EQP 5736 (Rev 11-04)

## RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Severstal Dearborn, LLC		County _Wayne
Source Address 4001 Miller Road	City	Dearborn
AQD Source ID (SRN) A8640 ROP No.	199700004	ROP Section No. 1
Please check the appropriate box(es):		
Annual Compliance Certification (Pursuant to Rule 213(4)(c))		
Reporting period (provide inclusive dates): From 01/01/1	.2 To 12/31/2	12
<ul> <li>1. During the entire reporting period, this source was in compliterm and condition of which is identified and included by this remethod(s) specified in the ROP.</li> </ul>	ance with ALL terms and colerence. The method(s) used	nditions contained in the ROP, each d to determine compliance is/are the
2. During the entire reporting period this source was in completerm and condition of which is identified and included by this deviation report(s). The method used to determine compliance unless otherwise indicated and described on the enclosed deviation.	reference, EXCEPT for the ce for each term and condition	deviations identified on the enclosed
Semi-Annual (or More Frequent) Report Certification (Pursua	24.2(2\/-\)	
Mosenii-Annual (of More Frequent) Report Certification (Pulsua	It to Hule 213(3)(C))	
Reporting period (provide inclusive dates): From 07/01/1		
<ol> <li>During the entire reporting period, ALL monitoring and associate deviations from these requirements or any other terms or conditions.</li> </ol>	ated recordkeeping requirem	ents in the ROP were met and no
2. During the entire reporting period, all monitoring and associal deviations from these requirements or any other terms or conditional enclosed deviation report(s).	ated recordkeeping requirem ions occurred, <b>EXCEPT</b> for t	nents in the ROP were met and no the deviations identified on the
Other Report Certification		
Reporting period (provide inclusive dates): From	То	
Additional monitoring reports or other applicable documents requi	red by the ROP are attached	as described:
I certify that, based on information and belief formed after reasonal supporting enclosures are true, accurate and complete	le inquiry, the statements a	and information in this report and the
Bruce L. Black V.	P. and General Manag	ger (313) 317-8955
Name of Responsible Official (print or type)		Phone Number
B 1811		3/14/13
Signature of Responsible Official		Date

\* Photocopy this form as needed.





### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severst	al Dearborn, LLC				County _	Wayne
Source Address 4001	Miller Road			City	Dearbor	n
AQD Source ID (SRN)	A8640 ROPN	o. <u>19</u>	9700004		ROP Secti	on No. <u>1</u>
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual	⊠ Semi Annual □ O	ther (Describe	e)			
1. Group or Source Wide ID EGCBFCASTHOUSE	2. Condition No. E-01.02 II.B.2	3. Date(s) of 9/11/12	Occurrence	4. Previously n  Yes  September	□ No	5. Duration of Deviation Portion of one cast/ not longer than 1 - 2 hours
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  Photo received from MDEQ  7. Description of Deviation Based upon photographic evidence it is possible that the casthouse roof monitor may have exceeded 20% opacity (6 min ave).						
Photo received of the root cause has been when using a single to 5 feet, then paus	8. Reason for Deviation and Description of Corrective Action Taken Photo received of the cast house taken on 9/11/12 showing dust coming from the casthouse. The root cause has been identified as a wet tap hole. The clay did not have time to dry between casts when using a single taphole. Severstal has reprogrammed the single taphole drill-out to drill 4.5 to 5 feet, then pause before continuing to drill, in order to heat up the clay so it can cure before the taphole is open.					
1. Group or Source Wide ID FGB&CCASTHOUSE	2. Condition No. F-01.01 III.A.3.1	3. Date(s) of		4. Previously r □Yes	eported ?  No	5. Duration of Deviation 6 monthly calculations
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Did not calculate PM-10, manganese, arsenic, and chromium VI emissions by the end of each calendar month from the casthouses.						
The calculations for	Calendar month from the casthouses.  8. Reason for Deviation and Description of Corrective Action Taken  The calculations for these emissions no longer apply since Permit 182-05B has newer calculations.  Permit 182-05B conditions were included in the most recent ROP application.					



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Source Address 4001	Miller Road			City	Dearborn	<u>a</u>
AQD Source ID (SRN)	A8640 ROP No	o. <u>19</u>	9700004		ROP Secti	ion No. 1
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1:	2
Report Type: 🛛 Annual	I ⊠ SemiAnnual 🔲 Ot	ther (Describe	;)			
1. Group or	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously r		5. Duration of Deviation
Source Wide ID	B-1 VI.3.	İ	,	∐Yes	⊠ No	
FGB&CCASTHOUSE	F-01.01 VI.1.	1/1/12 -	12/31/12			12 months
	F-01.01 VI.3.	<u> </u>	<del></del> !			
Reason for Deviation as  8. Reason for Deviation as		· Action Taken	Documental required operation Furnace Consumers are supply air supply access documents are missing for supply age, call position are missing access documents.	and mainten asthouse Bag to confirm leted. Dail y are missin itoring of cys in the fi second half corrective Weekly capt or 18 weeks in the second ion that dusen found. Mes were miss checks for ibration of and inspecting. Annual i	c's Iron a mance plan phouse have that the year of the year actions had actions had half year is removed in the find half year actions actions actions actions action of the year action of the year actions action and half year action for Aleaks in fan amperion of intenspection	and Steel MACT n for C Blast ve not been located ese inspections ring of compressed /1/12 - 8/15/12. cycles is missing of the year and 4 ear. Bag leak have not been em inspections are irst half year and
completed than can hat data retrieval has h	ted and inspections a be documented at this been hindered due to tation and retrieval	s time. Cer software a	tain inspec	ctions are k	nown to h	have been done, but



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Source Address 4001	Miller Road			City _Dear	born	
AQD Source ID (SRN)	A8640 ROP No	o. <u>19</u>	9700004	ROP	Section No.	. 1
ROP Section Contact	James E. Earl			Contact Phone N	o. <u>(313</u>	) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1:	2	to <u>12/3</u>	1/12	
Report Type: 🛛 Annual	⊠ Semi Annual ☐ Ot	ther (Describe	)			
1. Group or Source Wide ID EGCBFCASTHOUSE	2. Condition No. E-01.02 VI. 1.	3. Date(s) of		4. Previously reported  ☐Yes         N	0	uration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Missing electronic data for damper position and fan amperage for 68% of 1 <sup>st</sup> quarter, 43% of 2 <sup>nd</sup> quarter, 20% of 3 <sup>rd</sup> quarter, and 7% of 4 <sup>th</sup>					position and	
A review of damper produced maintenance plan. If plan 98% to 100% (dethe result of damper system complies with data review of trendintervals per MACT rebaghouse at every so To protect against of	quarter.  8. Reason for Deviation and Description of Corrective Action Taken  A review of damper positions during the operations shows general agreement with the operation and maintenance plan. Dampers were within the range specified in the MACT operation and maintenance plan 98% to 100% (depending on which damper) of the time for all of 2012. Slight deviations can be the result of damper positions being captured while they were travelling between scenarios. The system complies with fan current settings 99% of the time for all of 2012. Compliance was based on data review of trended damper positions and fan amperage. Data was sampled at fifteen minute intervals per MACT requirement. This technique was successful in providing data for the casthouse baghouse at every scenario it encountered as well as to verify the existence of historical records. To protect against data loss in the future, Severstal plans to download data more frequently from the blast furnace data historian server.					
4.0	O. O. Etc. No.	0.004 (0) 01	0	4 Du in alum and	10 15 0	nation of D. intio
1. Group or Source Wide ID EGCBFCASTHOUSE	2. Condition No. E-01.02 V.4. E-01.02 VI.1.	3. Date(s) of		4. Previously reported  ☐Yes	0	uration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Documentation of a number of inspections required by Iron and Steel MACT have not been located as indicated in the deviation box above and on page 2.						
and on page 2.  3. Reason for Deviation and Description of Corrective Action Taken  2. Contains a collected and many inspections are performed. It is believed that more inspections were completed than can be documented at this time. Certain inspections are known to have been done, but data retrieval has been hindered by software and personnel issues. Severstal is working to improve the documentation and retrieval system.						



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This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Address 4001	Miller Road			City _De	earborn		
AQD Source ID (SRN)	A8640 ROP N	io. <u>199</u>	9700004	RO	OP Section	n No. <u>1</u>	
ROP Section Contact	James E. Earl			Contact Phone	e No(	(313) 845-3217	
Reporting Period (provide	inclusive dates): From	n <u>01/01/12</u>	2	to <u>12</u>	2/31/12		
Report Type: 🛛 Annual	I 🛛 Semi Annual 🔲 O	ther (Describe	)				
Group or Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously repor ⊠Yes □	rted ?	5. Duration of Deviation	
EGBOF	E-01.04 VI.1	4/11/12 - 4/28/12 -	' '	Quarterly repo dated July 30, 2012		171 hours	
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Deviation from 10% 1-hour opacity limit required by Iron and Steel MACT.						
See previously submands Engineering in April inspection resulted Severstal has hired	8. Reason for Deviation and Description of Corrective Action Taken See previously submitted BOF ESP COMS Q2 2012 report dated July 30, 2012. Severstal hired TRK Engineering in April 2012 and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and were completed on November 26, 2012. Severstal has hired a consultant to develop enhanced and more detailed operation and maintenance practices for the ESP. An updated plan has been developed and circulated to the EPA and DEQ for their review.						
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 VI.1	3. Date(s) of 8/30/12 - 9/6/12 - 9	9/4/412 9/9/12	4. Previously repor	) No ort 30,	5. Duration of Deviation 141 hours	
	etermine Compliance S method specified in R		Deviation	ption of Deviat from 10% 1-hou nd Steel MACT.		ty limit required	
See previously submit Engineering in April inspection resulted Severstal has hired	nd Description of Corrective itted BOF ESP COMS Q3 1 2012 and they perfo in repairs that bega a consultant to deve SP. An updated plan	3 2012 reportormed an infant on July 3 selop enhance	rt dated Od terior insp 23, 2012 and ed and more	pection of the nd were complete e detailed oper	ESP on ted on N cation a	June 13. This November 26, 2012. and maintenance	

Source Name Severstal Dearborn, LLC

County \_\_wayne



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Source Address 4001	Miller Road			City	Dearbori	1
AQD Source ID (SRN)	A8640 ROP N	0. 199	9700004		ROP Secti	on No. <u>1</u>
ROP Section Contact	James E. Earl			Contact Pl	none No.	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual	Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe)					
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	Occurrence	4. Previously reconstruction  Yes If Yes, Dat 10/5/12 and 10/26/12 NO responses	No le	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  Per NOV dated September 13, 2012: 41% was the highest 6-minute average opacity from the ESP stack during the time of observation.				ity from the ESP		
See NOV responses de repairs were in pro- repairs to the ESP of develop enhanced and	8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated October 5, 2012 and October 26, 2012. On the date of the violation, repairs were in progress on the ESP. The AVC #5A tripped out and had to be reset. The major repairs to the ESP were completed as of November 26, 2012. Severstal has hired a consultant to develop enhanced and more detailed operation and maintenance practices for the ESP. An updated plan has been developed and circulated to the EPA and DEQ for their review.					
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 V.1.	3. Date(s) of	Occurrence	4. Previously re  ⊠Yes 8/27/12, 9/ 10/5/12, 10 2/20/13 NOV responses	☐ No 4/12, /26/12,	5. Duration of Deviation 9 months
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOVs dated 9/13/2012 and 1/30/2013: Alleged failure to properly install, maintain and operate the ESP.						
See NOV responses day February 20, 2013.Se 2012. Severstal his the ESP on June 13. completed on November detailed operation a	operate the ESP.  8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated August 27, 2012, September 4, 2012, October 5, 2012, October 26, 2012 and February 20, 2013. Severstal initially discovered problems with operation of the ESP in March of					



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Source Name Severst	al Dearborn, LLC			County	Wayne
Source Address 4001 Miller Road City Dearborn					1
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004	ROP Secti	on No. <u>1</u>
ROP Section Contact	James E. Earl			Contact Phone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to <u>12/31/1</u>	2
Report Type: 🛛 Annual	Semi Annual 🔲 O	ther (Describe	)		
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported ?  ⊠Yes □ No	5. Duration of Deviation
Source Wide ID EGBOF	E-01.04.II.B.2	8/8/12		If Yes, Date NOV response 9/4/12	6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated August 14, 2012: 41% was the highest 3-minute average opacity from the BOF roof monitor.					
8. Reason for Deviation and Description of Corrective Action Taken  See NOV response dated September 4, 2012. The excess opacity resulted from restart of an oxygen blow after it had been aborted. Procedures have been revised to reduce the flow rate of oxygen and change the lance height to reduce emissions. The next roof monitor observation on 8/13/2012 had no roof monitor emissions above 20% 3-minute average.					
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04.II.B.2	3. Date(s) of		4. Previously reported?  ⊠Yes □ No  If Yes, Date  NOV responses  8/27/12 and 9/4/12	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated July 31, 2012: 31% was the highest 3-minute average opacity from the BOF roof monitor.					
See NOV responses da resulted from the da was higher than usua to reduce emissions					



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Source Name Severstal Dearborn, LLC County Wayne							
Source Address 4001	Source Address 4001 Miller Road City Dearborn						
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004	ROP Sect	ion No. <u>1</u>		
ROP Section Contact	James E. Earl			Contact Phone No.	(313) 845-3217		
Reporting Period (provide	inclusive dates): From	01/01/1	2	to 12/31/1	2		
Report Type: 🛛 Annual	⊠ Semi Annual □ O	ther (Describe	:)				
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a	3. Date(s) of	Occurrence	4. Previously reported?  Yes No If Yes, Date  NOV responses  8/27/12 and 9/4/12	5. Duration of Deviation 15 minutes		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated July 31, 2012: 42% was the highest 6-minute average Opacity from the BOF ESP stack.							
8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated August 27, 2012 and September 4, 2012. During this time period, the ESP was in the process of being repaired. Severstal hired TRK Engineering in April 2012 and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and were completed on November 26, 2012. Severstal has hired a consultant to develop enhanced and more detailed operation and maintenance practices for the ESP. An updated plan has been developed and circulated to the EPA and DEQ for their review.							
1. Group or Source Wide ID EGBOF	Source Wide ID ⊠Yes □ No			5. Duration of Deviation 3 minutes			
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated July 19, 2012: 43% was the highest 3-minute average Opacity at the BOF Roof Monitor.							
See NOV response dat after it had been al damper is 100% opens	nd Description of Corrective ted August 9, 2012. Toorted. Initially pred to reduce fugitive /2012 had no roof mon	he excess Ocedures w e emissions	Opacity re ere revise escaping	d to assure that the from the BOF. The ne	main exhaust xt roof monitor		



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Source Address 4001	Miller Road			City	Dearborn	1
AQD Source ID (SRN)	A8640 ROP N	o. <u>199</u>	700004		ROP Secti	on No. <u>1</u>
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type:   Annual	Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe)					
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 III.A.3.6	3. Date(s) of January to December 2	<b>o</b>	4. Previously r □Yes	reported ?	5. Duration of Deviation 12 months
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Did not perform all preventative maintenance on the ESP as specified in the operation and maintenance plan for the ESP. Monthly inspections for checking pressure sensor vs.  manometer and checking boiler hood for leaks not performed. Daily checks are made of steam usage, but not of steam flow.						
On a going-forward h	nd Description of Corrective basis the approach to d. An updated plan h	inspection	ns at the			
4 6	O Condition No	0 Day-(a) at	0.000	4. Draviovsky	anadad 2	5. Duration of Deviation
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 V.3.	3. Date(s) of		4. Previously r □Yes	eported 7	31 days
6. Method Used to Determ (if different from method sp					not wett	ed when moved in a
	nd Description of Corrective due to operator erro			een retraine	ed.	



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Source Name Severst	al Dearborn, LLC			Cou	nty <u>Wayne</u>	
Source Address 4001	Miller Road			City _Dea	rborn	
AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004	ROF	Section No.	1
ROP Section Contact	James E. Earl			Contact Phone	No. (313)	845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to <u>12/</u>	/31/12	
Report Type: 🛛 Annual	🖾 Semi Annual 🔲 O	Other (Describe	e)			
		,				
1. Group or	2. Condition No.		Occurrence	4. Previously reporte		ration of Deviation
Source Wide ID EGBOF	E-01.04 V.3.	12/1/12 -	12/31/12	_Yes ⊠	NO 31 d	ays
6. Method Used to Determ (if different from method sp	pecified in ROP)		Precipita covered t	n of Deviation tor dust was not ruck.	wetted wh	en moved in a
	nd Description of Corrective due to problems with			Water system h	as been re	paired.
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reporte		ation of Deviation
Source Wide ID EGBOF	General Conditions 2.a.	8/28/12		□Yes ⊠	I	nutes
	7. Description of Deviation  The highest six minute opacity average was 30% from the BOF ESP stack.					
During this time per Engineering in April inspection resulted Severstal has hired	nd Description of Corrective riod, the ESP was in 1 2012 and they perfo in repairs that bega a consultant to deve EP. An updated plan	the proces ormed an in an on July elop enhanc	s of being terior insp 23, 2012 and ed and more	pection of the E nd were complete e detailed opera	SP on June d on Novem tion and m	13. This ber 26, 2012. aintenance



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Source Address 4001	Miller Road			City _Dearborn	1		
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u> 9	700004	ROP Secti	on No. <u>1</u>		
ROP Section Contact	James E. Earl			Contact Phone No	(313) 845-3217		
Reporting Period (provide	Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12						
Report Type: 🛛 Annual	⊠ Semi Annual ☐ O	ther (Describe	)				
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously reported ? ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 3 minutes		
6. Method Used to Determ (if different from method sp				n of Deviation tor exceeded 20% opac	city (3 min)limit		
The emission occurred than normal. The op-	oerators have been re	l charge on e-instructe	B Vessel, d to follo	which appeared to be w the correct procedu no roof monitor emiss	are for hot metal		
					-		
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously reported ?  ☑Yes ☐ No  If Yes, Date  12/28/12 and  2/7/13 NOV  responses	5. Duration of Deviation 15 minutes		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Roof monitor exceeded 20% opacity (3 min) limit.							
See NOV responses da damper was not immed damper was reopened, the tapping hood and	diately reopened, con , emissions subsided. d keep the tapping da	7/13. Slag ntributing . The opera amper open	conditione to roof mon tors were until the	r was added after tap nitor emissions. One reinstructed to keep emissions subside. The ns above 20% 3-minute	ce the tapping the ladle under ne next roof		



#### RENEWABLE OPERATING PERMIT **DEVIATION REPORT**

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Source Address 4001 Miller Road					Dearborn	1
AQD Source ID (SRN) _ A8640 ROP No 199700004					ROP Secti	on No. 1
ROP Section Contact	James E. Earl		_	Contact P	hone No.	(313) 845-3217
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12						
Report Type: 🛛 Annual	⊠ Semi Annual 🔲 O	ther (Describe	)			
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously r  ⊠Yes  If Yes, Date 12/28/12 ar 2/7/13 NOV responses	□ No	5. Duration of Deviation 3 minutes
6. Method Used to Determ (if different from method s				n of Deviation	1 20% opac	city (3 min) limit.
See NOV responses do Vessel. Severstal re a final report on Fo practices has been	nd Description of Corrective ated 12/28/12 and 2/7 etained Hatch to eval ebruary 7 <sup>th</sup> , 2013. A cinstituted to improve of monitor emissions	7/13. Emiss uate the c combination e emission	ions occur: ause of the of damper capture. '	e roof monit position ch The next roo	or emissi nanges and	ions. Hatch issued d operating
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously r □Yes If Yes, Date	eported ? ⊠ No	5. Duration of Deviation 3 minutes
6. Method Used to Determ (if different from method sp				n of Deviation tor exceeded	20% opac	city (3 min) limit.
Severstal retained been instituted to	nd Description of Corrective Hatch to evaluate the 7 <sup>th</sup> , 2013. A combinate improve emission capt	cause of ion of damp ure. The	the roof moer position	n changes ar	nd operat	ing practices has



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Source Name _ Severst	al Dearborn, LLC		Countyv	Wayne				
Source Address 4001 Miller Road City Dearborn								
AQD Source ID (SRN)		ROP Section	on No. <u>1</u>					
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217								
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12								
Report Type: 🛛 Annual	⊠ Semi Annual ☐ Ot	ther (Describe	÷)					
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously re ☐Yes	eported? ⊠ No	5. Duration of Deviation		
EGBOF	E-01.04 II.B.2.	8/9/12	ļ	If Yes, Date		3 minutes		
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Roof monitor exceeded 20% opacity (3 min) limit.							
Severstal retained H report on February 7 been instituted to i	nd Description of Corrective Hatch to evaluate the 7 <sup>th</sup> , 2013. A combinati improve emission capt ons above 20% 3-minut	e cause of ion of damp ture. The	the roof mo per positio next roof m	n changes ar	nd operati	ing practices has		
10	0.0 12 15	0 Date (a) a(		4 D = 1= =1:		5 D alla al Da talla		
1. Group or Source Wide ID	2. Condition No.		Occurrence	4. Previously re □Yes	eported? ☐ No	5. Duration of Deviation		
EGBOF	E-01.04 II.B.2.	9/18/12		If Yes, Date		6 minutes		
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Roof monitor exceeded 20% opacity (3 min)							
The primary damper w of the roof monitor damper position chan	nd Description of Corrective was set at 20% in ins emissions. Hatch is ages and operating pror observation on 9/2	stead of 35 ssued a fin- actices ha	%. Seversta al report o s been inst	on February tituted to i	7 <sup>th</sup> , 2013. mprove em	. A combination of mission capture.		



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County Wayne

Source Address 4001 Miller Road City Dearborn									
AQD Source ID (SRN)	AQD Source ID (SRN)A8640 ROP No 199700004 ROP Section No1								
ROP Section Contact	Jam <u>es E. Earl</u>			Contact Pl	none No	(313) 845-3217	_		
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2	_		
Report Type: 🛛 Annual	⊠ Semi Annual □ O	ther (Describe	e)				_		
_									
1. Group or Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously re □Yes	eported? ⊠ No	5. Duration of Deviation			
EGBOF	E-01.04 II.B.2.	10/8/12		If Yes, Date		9 minutes			
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Roof monitor exceeded 20% opacity (3 min)									
One occurrence may have to charging emissions set at 25% versu	nd Description of Corrective nave been due to a dessions escaping throus 35% as recommended ne next roof monitor average.	esulf slag Igh the boi I by Hatch	pot dump. ler hood. during hot	It was note metal charg	d that thing. The	he primary damper damper position			
1. Group or Source Wide ID	2. Condition No.	, ,	Occurrence	4. Previously re □Yes	eported ? ⊠ No	5. Duration of Deviation			
EGBOF	E-01.04 II.B.2.	10/30/12		If Yes, Date		6 minutes			
6. Method Used to Determ (if different from method sp		:			20% opac	city (3 min) on the	:		
Severstal retained Freport on February	nd Description of Corrective Hatch to evaluate the 7 <sup>th</sup> , 2013. A combinat: improve emission capt	cause of	the roof m per position	on changes ar	nd operat	ing practices has			

roof monitor emissions above 20% 3-minute average.



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AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004	ROP Secti	on No. <u>1</u>				
ROP Section Contact  James E. Earl  Contact Phone No. (313) 845-3217									
Reporting Period (provide	Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12								
Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe)									
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously reported ? ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 9 minutes				
6. Method Used to Determ (if different from method sp				n of Deviation tor exceeded 20% opac	city (3 min) limit				
8. Reason for Deviation and Description of Corrective Action Taken  The first of three occurrences involved emissions from the lance hole and boiler hood during a blow on "A" Vessel. This occurred upon re-ignition after ignition was lost 1 minute into the oxygen blow. The other two occurrences involved emissions through the lance hole and boiler hood immediately after charging, when the vessel was up righted. Severstal retained Hatch to evaluate the cause of the roof monitor emissions. Hatch made an operating change recommendation to resolve emissions after a hot metal charge by not up righting the vessel immediately, allowing time for the primary damper to open. The next roof monitor observation on 11/21/2012 had no roof monitor emissions above 20% 3-minute average.									
1. Group or Source Wide ID EGBOF	2. Condition No. E-01.04 II.B.2.	3. Date(s) of	Occurrence	4. Previously reported?  ⊠Yes □ No If Yes, Date 1/18/13 letter to MDEQ	5. Duration of Deviation 9 minutes				
6. Method Used to Determ (if different from method sp				n of Deviation tor exceeded 20% opac	city (3 min) limit				
See letter to MDEQ of signals to the Secon to malfunction. As December 31 <sup>st</sup> and re	8. Reason for Deviation and Description of Corrective Action Taken  See letter to MDEQ dated 1/18/13. A small fire near some of the control wiring that provides signals to the Secondary Emission control system collection hood damper position caused the system to malfunction. As a result, the emission capture was affected. The problem was discovered on December 31 <sup>st</sup> and repaired completed on January 1 <sup>st</sup> . The next roof monitor observation on 1/9/2013 had no roof monitor emissions above 20% 3-minute average.								

Source Name Severstal Dearborn, LLC

Source Address 4001 Miller Road

County Wayne

City Dearborn



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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County Wayne

Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Address 4001	Miller Road			City Dearborn	n
AQD Source ID (SRN)	A8640 ROP N	o. <u>199</u>	9700004	ROP Secti	ion No. 1
ROP Section Contact	James E. Ea <u>rl</u>			Contact Phone No.	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to <u>12/31/1</u>	2
Report Type: 🛛 Annual	⊠ Semi Annual □ O	ther (Describe	)		
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported ?	5. Duration of Deviation
Source Wide ID EGBOF	General Condition 2.a.	11/28/12		∏Yes ⊠ No If Yes, Date	6 minutes
	etermine Compliance S			ption of Deviation	
(if different from m	method specified in F	ROP)	Highest 6 the BOF E	-minute average opac SP stack	ity was 28% from
COMS data					
	nd Description of Corrective			2 (a) mb	
	opacity potentially time period and no				
interference with the					
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported?	5. Duration of Deviation
Source Wide ID EGBOF	General Condition	11/29/12		☐Yes	6 minutes
EGBOT	2.a.	11/29/12		il ies, Date	6 minutes
	etermine Compliance S			ption of Deviation	
(if different from r	method specified in F	ROP)		-minute average opac	
COMS data				SP stack, except for er hour of 27%	one 6-minute
	nd Description of Corrective	Action Taken		or nour or 275	
COMS data indicated	opacity potentially	in excess	of Rule 30		
	e time period and no	basis to c	onfirm tha	t it was not steam o	r other
interference with the	ne COMS.				
4.0	O. Comellida e No	Day (a) a4	Ô	A Du Javaliu i ana a d O	F Demokra of D. Josia
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported? ☐Yes ☑ №	5. Duration of Deviation
EGBOF	General Condition	11/30/12		If Yes, Date	6 minutes
	2.a.				
6 Method Head to De	 etermine Compliance §	Etatus I	7 Descri	 ption of Deviation	•
	method specified in F			-minute average opac	ity was 23% from
	•	ļ	the BOF E	SP stack, except for	
COMS data	ID SUBSTITUTE OF THE	• - N T - N		er hour of 27%	
	nd Description of Corrective opacity potentially			1(a) There was no ma	ethod 9 reading
	e time period and no				
interference with the					
*Photocopy this form as need	ed.	Page 15 c	of 34		EQP 5737 (2/10)



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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County Wayne

Source Address 4001 Miller Road City Dearborn						
AQD Source ID (SRN)A8640 ROP No 199700004 ROP Section No 1						
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217						
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12						
Report Type: 🛛 Annua	I ⊠ Semi Annual □ C	ther (Describe	e)	<del>-</del>		
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	Occurrence	4. Previously reported ?  ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 6 minutes	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  COMS data  7. Description of Deviation Highest 6-minute average opacity was 24% from the BOF ESP stack, except for one 6-minute average per hour of 27%						
COMS data indicated	8. Reason for Deviation and Description of Corrective Action Taken COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading corresponding to the time period and no basis to confirm that it was not steam or other					
		_	-			
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	Occurrence	4. Previously reported ? ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 6 minutes	
	etermine Compliance Smethod specified in F		35% was t	ption of Deviation he highest 6-minute BOF ESP Stack.	average opacity	
COMS data indicated	and Description of Corrective opacity potentially time period and no he COMS.	in excess	of Rule 30	1(a). There was no m t it was not steam o	ethod 9 reading or other	
					_	
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	Occurrence	4. Previously reported? ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 6 minutes	
3	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  32% 6-minute average opacity from the BOF ESP Stack.					
8. Reason for Deviation a COMS data indicated	and Description of Corrective opacity potentially time period and no he COMS.	in excess	of Rule 30			



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County Wayne

Source Address 4001	Miller Road			City	Dearborn	1
AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004		ROP Secti	ion No
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12					
Report Type: 🛛 Annual	I ⊠ SemiAnnuaI 🔲 O	Other (Describe	e)			
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition	3. Date(s) of	f Occurrence	4. Previously i □Yes If Yes, Da	⊠ No	5. Duration of Deviation  12 minutes
•	2.a.					
	etermine Compliance S method specified in R		22% was to	BOF ESP Stac	6-minute a ck, except	average opacity t for one 6-minute
8. Reason for Deviation and Description of Corrective Action Taken  COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading corresponding to the time period and no basis to confirm that it was not steam or other interference with the COMS.						
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	f Occurrence	4. Previously i □Yes If Yes, Da	№ Мо	5. Duration of Deviation 6 minutes
	etermine Compliance S method specified in R		27% 6-min		opacity f	from the BOF ESP e average per hour
COMS data indicated	and Description of Corrective opacity potentially time period and no he_COMS.	in excess	of Rule 30			
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	f Occurrence	4. Previously I □Yes If Yes, Da	№ Мо	5. Duration of Deviation 24 minutes
	etermine Compliance S method specified in R		48% was t	ption of Dev he highest 6 BOF ESP Stac	6-minute a	average opacity
#2 Compartment taker COMS data indicated	<pre>Ind Description of Corrective n offline at 8:00 AM   opacity potentially e time period and no</pre>	to clear g in excess	round in 2 of Rule 30	1(a) There	was no me	ethod 9 reading

interference with the COMS.



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County Wayne

Dearborn

AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004	ROP Sect	tion No. 1	
ROP Section Contact	James E. Earl			Contact Phone No.	(313) 845-3217	
Reporting Period (provide	inclusive dates): Fron	n <u>01/01/1</u>	.2	to 12/31/1	.2	
Report Type: 🛛 Annua	l ⊠ Semi Annual 🗍 C	Other (Describe	∍)			
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	12/17/12	f Occurrence	4. Previously reported ?  ☐Yes ☑ No If Yes, Date	5. Duration of Deviation 6 minutes	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  28% 6-minute average opacity from the BOF ESP Stack.						
8. Reason for Deviation and Description of Corrective Action Taken  COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading corresponding to the time period and no basis to confirm that it was not steam or other interference with the COMS.						
Group or     Source Wide ID     EGBOF	2. Condition No.  General Condition	3. Date(s) of	f Occurrence	4. Previously reported ? ☐Yes ☒ No If Yes, Date	5. Duration of Deviation 6 minutes	
	2.a. etermine Compliance S method specified in I		28% was t	ption of Deviation he highest 6-minute a BOF ESP Stack.	average opacity	
8. Reason for Deviation a COMS data indicated	and Description of Corrective opacity potentially e time period and no he COMS.	in excess	of Rule 30	1(a). There was no me t it was not steam o:	ethod 9 reading r other	
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of	f Occurrence	4. Previously reported ?  ☐Yes ☒ No  If Yes, Date	5. Duration of Deviation 6 minutes	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  21% 6-minute average opacity from the BOF ESP Stack, except for one 6-minute average per hour						
COMS data indicated corresponding to the	8. Reason for Deviation and Description of Corrective Action Taken  COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading corresponding to the time period and no basis to confirm that it was not steam or other interference with the COMS.					

Source Name Severstal Dearborn, LLC

Source Address 4001 Miller Road



#### RENEWABLE OPERATING PERMIT **DEVIATION REPORT**

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Source Name Severstal Dearborn, LLC					у _	Wayne
Source Address 4001 Miller Road City Dearborn						n
AQD Source ID (SRN)         A8640         ROP No.         199700004         ROP Section No.         1						
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217						
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12						
Report Type: 🛛 Annual	⊠ Semi Annual ☐ O	ther (Describe	e)			
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition	3. Date(s) of	Occurrence	4. Previously reported  ☐Yes  If Yes, Date	i? No	5. Duration of Deviation 6 minutes
2.a.  6. Method Used to Determine Compliance Status (if different from method specified in ROP)  COMS data  7. Description of Deviation  27% 6-minute average opacity from the BOF ESP Stack opacity monitor, except for one 6-minute average per hour of 27%						
COMS data indicated	nd Description of Corrective opacity potentially at time period and no ne COMS.	in excess	of Rule 30			
1. Group or Source Wide ID EGBOF	2. Condition No. General Condition 2.a.	3. Date(s) of	Occurrence	4. Previously reported  ☐Yes       If Yes, Date	l? No	5. Duration of Deviation 12 minutes
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation 36% was the highest 6-minute average opacity from the BOF ESP Stack opacity monitor.					
8. Reason for Deviation and Description of Corrective Action Taken Heat aborted due to high stack temp. Discovered problem with air on spray water. Operation restarted at 11:55 AM. COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading corresponding to the time period and no basis to confirm that it was not steam or other interference with the COMS.						
			_			
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported  ☐Yes  ☐	i? No	5. Duration of Deviation

interference with the COMS.

General Condition

2.a. 6. Method Used to Determine Compliance Status

(if different from method specified in ROP)

8. Reason for Deviation and Description of Corrective Action Taken

EGBOF

COMS data

COMS data indicated opacity potentially in excess of Rule 301(a). There was no method 9 reading

12/28/12

corresponding to the time period and no basis to confirm that it was not steam or other

6 minutes

23% 6-minute average opacity from the BOF ESP Stack opacity monitor, except for one 6-minute

If Yes, Date

7. Description of Deviation

average per hour of 27%



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County Wayne

	Miller Road			City _Dear!	oorn		
AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004	ROPS	Section No. 1		
ROP Section Contact	James E. Earl			Contact Phone No	o. <u>(313)</u> 845-3217		
Reporting Period (provide	inclusive dates): From	01/01/1	.2	to <u>12/3</u>	1/12		
Report Type: 🛛 Annua	I ⊠ SemiAnnual 🔲 C	other (Describe	e)				
1. Group or Source Wide ID EGBOF	2. Condition No.  General Condition 2.a.	3. Date(s) of		If Yes, Date	No An aggregated total of 615 hours		
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  Recurrent 6-minute average opacity above 20% detected from the BOF ESP Stack opacity monitor.						
There was no method not steam or other they performed an i	and Description of Corrective 9 reading correspond interference with the nterior inspection of 23, 2012 and were con	ding to the e COMS. Sev f the ESP o	e time peri verstal hir on June 13.	ed TRK Engineering This inspection			
				_			
Group or     Source Wide ID     EGBOF	2. Condition No. E-01.04 VI.1	3. Date(s) of	f Occurrence	4. Previously reported  ☐Yes ☐ N			
6. Method Used to Determ (if different from method s	nine Compliance Status	1 -/ -/					
	nd Description of Corrective	Action Taken	Some inspirand Steel for the seither no been local of rotatical arm inspirance for leaks quarterly nitrogen ductwork, inspection motors, seither motors, seither motors air fan d	MACT operation as econdary emission to been performed of ted. These including equipment; weel pection, monthly and checking bag checks for CPMS line leakage; sem solenoid and damp of dust collect tructural members of 12 month of cinspection doors	and PT calibration and i-annual inspection of per valves; annual ion housing, fan		



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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adality projection, upon request. Items 1 - 6 mast be completed tot all to	seviations being reported.						
Source Name Severstal Dearborn, LLC	County Wayne						
Source Address 4001 Miller Road	City Dearborn						
AQD Source ID (SRN) A8640 ROP No. 19	9700004 ROP Section No. 1						
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217							
Reporting Period (provide inclusive dates): From 01/01/1	2 to 12/31/12						
Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe	e)						
	f Occurrence 4. Previously reported? 5. Duration of Deviation						
Source Wide ID B-1 VI.3.	12/31/12 Yes No 12 months						
6. Method Used to Determine Compliance Status  (if different from method specified in ROP)  7. Description of Deviation  A review of the suction pressure and damper positions during operation indicates that the system has operated outside the range specified in Severstal's MACT operation and maintenance							
The set points for the secondary baghouse dampers of the MACT operation and maintenance plan. The structure modifications to the damper set points have both the MACT plan, and the programmable damper consists which is system has been operating as designed at the fand system has operated at lower suction pressure that pressure has been lower primarily as a result of the pressure than anticipated. A review of the suction system has operated outside the range specified in system designer (Hatch) was contacted and noted the theoretical calculations, not actual pressure reached than expected, primarily, as a result of the baghouse than anticipated. It appears that actual system is calculations used to develop the suction pressure plan. As a result, the secondary baghouse is ablee	8. Reason for Deviation and Description of Corrective Action Taken The set points for the secondary baghouse dampers has been reviewed and enhanced since the adoption of the MACT operation and maintenance plan. The set points have also been studied by Hatch, and further modifications to the damper set points have been recommended. Severstal will be updating both the MACT plan, and the programmable damper controls to reflect the latest recommendations. The system has been operating as designed at the fan speed settings 100% of the time. However, the system has operated at lower suction pressure than specified in the MACT plan. The suction pressure has been lower primarily as a result of the baghouse operating at a lower differential pressure than anticipated. A review of the suction pressure during operation indicates that the system has operated outside the range specified in the MACT operation and maintenance plan. The system designer (Hatch) was contacted and noted that the original fan suction values were based on theoretical calculations, not actual pressure readings. The actual suction pressure has been lower than expected, primarily, as a result of the baghouse operating at a lower differential pressure than anticipated. It appears that actual system resistance is less than the theoretical calculations used to develop the suction pressure guidelines in the MACT operation and maintenance plan. As a result, the secondary baghouse is able to move the same amount of air with less pressure drop, resulting in a lower vacuum at the plenum. The system met the minimum suction						
1. Group or Source Wide ID B-1 VI.3.  Source Wide ID B-1 VI.3.  EGBOF Superscript State of Source Wide ID Source Wide ID Source Wide ID Source Weeks of Source Wide ID Sour	and 10 weeks 4/29/12						
6. Method Used to Determine Compliance Status (if different from method specified in ROP)	7. Description of Deviation Weekly inspections records confirming that the dust is being removed from hoppers as required by Iron and Steel MACT were not located.						
8. Reason for Deviation and Description of Corrective Action Taker Missing inspection reports for the 10 weeks noted.							



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Source Name Severst	al Dearborn, LLC				County _	Wayne	
Source Address 4001	Miller Road			City	Dearborn	n	
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004		ROP Secti	ion No	
ROP Section Contact	James E. Earl			Contact P	hone No.	(313) 845-3217	
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2	
Report Type:   Annual	Semi Annual 🔲 O	ther (Describe	)				
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously i ☐Yes	reported?	5. Duration of Deviation	
EGDESULFURIZATION	E-01.13 III.A.3.10	April and	October			2 months in 2012	
6. Method Used to Determ (if different from method sp				n of Deviation	of the 1	bag tension	
(ii dillefelit iieiii filotiod s	goomed in riol y					CT were not done.	
Missing inspection :	nd Description of Corrective report for two months enhanced. Outside con	. On a go	ing-forwar	d basis, the	approacl	h to inspections is th monthly	
<u> </u>							
Group or     Source Wide ID     EGDESULFURIZATION	2. Condition No. E-01.13 III.A.3.12	3. Date(s) of April, Ju September	Occurrence	4. Previously □ □Yes If Yes, Date	reported?	5. Duration of Deviation 3 months in 2012	
6. Method Used to Determ (if different from method sp			3 monthly			baghouse cleaning d Steel MACT were	
Missing inspection :	nd Description of Corrective reports for 3 months. enhanced. Outside con	On a goi	ng-forward	basis, the etained to a	approach	to inspections is th monthly	
	·						
1. Group or Source Wide ID EGDESULFURIZATION	2. Condition No.	3. Date(s) of Jan and F inclusive	eb	4. Previously ☐ ☐Yes	reported ?	5. Duration of Deviation  10 weeks	
EGDESOBLOKI ZATION	5 01.10 11.2	weeks of and 5/27/	4/29/12				
	method specified in R	ROP)	7. Description Weekly in dust is b by Iron a	eing removed	from ho	firming that the ppers as required ot located.	
8. Reason for Deviation a Missing inspection	nd Description of Corrective reports for the 10 we	by Iron and Steel MACT were not located.  8. Reason for Deviation and Description of Corrective Action Taken Missing inspection reports for the 10 weeks noted. Inspection reports were located the other weeks.					



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Source Name Severstal Dearborn, LLC County Wayne						Wayne
Source Address 4001 Miller Road City Dearborn						n
AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1						
ROP Section Contact  James E. Earl  Contact Phone No. (313) 845-3217						
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12						
Report Type: 🖾 Annual 🖾 Semi Annual 🔲 Other (Describe)						
1. Group or Source Wide ID EGNO1LRF	2. Condition No. E-01.05 III.VI.1 E-01.05 III.B.3.4	3. Date(s) of 5/31/12, 7/3/12	f Occurrence 6/23/12,	4. Previously r □Yes	eportedi? ⊠ No	5. Duration of Deviation 3 alarm events in 2012
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation It is possible no corrective action was taken in response to bag leak detection alarms; it cannot be determined whether it was a legitimate alarm on these dates.						
Alarms are acknowled mailed to the mainte	and Description of Corrective dged by operations. I enance manager for coand now all bag leak and documentation.	It was disc orrective a	covered that	documentatio	n as was	intended. This
1. Group or Source Wide ID EGNO1LRF	Source Wide ID 7/10/12, 7/17/12, ☐ Yes ☑ No					
	6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation 8 weekly readings greater than 9 in w.c.					
	8. Reason for Deviation and Description of Corrective Action Taken Investigation noted that there was some leakage in the pulse jet compressed air system at the					

September.

baghouse. Repairs were made and there were no high differential pressure readings noted after



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC					County _	Wayne
Source Address 4001	Source Address 4001 Miller Road Cit					n
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004		ROP Secti	ion No. 1
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217						
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual	I ⊠ Semi Annual □ O	ther (Describe	)		_	
1. Group or	2. Condition No.	3. Date(s) of		4. Previously		5. Duration of Deviation
Source Wide ID EGNO1LRF	E-01.05 VI.2.	Weeks of 7/22/12 a: 8/19/12		☐Yes If Yes, Date	⊠ No	3 weeks in 2012
Method Used to Determine Compliance Status     (if different from method specified in ROP)			7. Description of Deviation Inspection records confirming that dust is being removed from hoppers was not located during the weeks noted.			
	nd Description of Corrective					
The inspection recorpression recorpression recording week or the contract of t	rds for the weeks not he following week.	ed were no	t located,	but two wer	re complet	ted either the
, <u>F</u>	<u></u>				_	
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously i ⊠Yes	reported ?	5. Duration of Deviation
Source Wide ID EGNO1LRF	E-01-05, III.A.3.2	January,	April.	Mires   12/28/12 ai	_	5 months
	E-01-05,	July, Oct		2/7/13 NOV		
	III.A.3.13	December		Response le	etters	
6. Method Used to Determ	nine Compliance Status			n of Deviation		
(if different from method sp	pecified in ROP)			ated Novembe		12, LRF # 1 inspected once
						operational and
physical condition, as well as the cleaning						
9 Boscon for Deviation o	nd Description of Corrective	Action Taken		s and writte	en records	s maintained.
	nd Description of Coffective ated December 28, 201			13. For t	he calen	dar year 2012, 5
months of inspect:	ions were missed. C	outside co				
LRF No. 1 monthly	and quarterly insp	ections.				
			_			



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC					Wayne
Source Address 4001	Miller Road			CityDearb	orn
AQD Source ID (SRN)	A8640 ROP No	o. <u>19</u> 9	9700004	ROP S	ection No. 1
ROP Section Contact	James E. Earl			Contact Phone No	. (313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to 12/31	./12
Report Type: 🛛 Annual	ıl 🛚 Semi Annual 🔲 O	ther (Describe	·)		
				<del>,                                    </del>	
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported	
Source Wide ID EGBNO1LRF	E-01.05 V.1. E-01.05 V.2.	   1/1/12 - :	12/31/12	□Yes 🖾 No	12 months
EGBNOTHER	E-01.05 VI.2.	1/1/12	12/31/12		12 montine
6. Method Used to Determ				on of Deviation	
(if different from method sp	pecified in ROP)			tion of a number o	f inspections MACT have not been
		l		by from and Steel Some missing inspe	
				s on pages 23, 24	
	and Description of Corrective				
	compliance with these				
	required. On a goin iewed, revised and en		basis the	approach to inspec	tions at the LRF1 has
Deen choroaghry revi	Tewed, Tevised and Ch	manceu.			
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported	? 5. Duration of Deviation
Source Wide ID				⊠Yes	ı
EGLADLEREFINE2	E.01.11 III.A.3.2	January, (		12/28/12 and	3 months in 2012
	E.01.11 III.A.3.13	and Decemb	oer j	2/7/13 NOV	
6. Method Used to Determ	oine Compliance Status	<del></del>	7 Description	Response letters on of Deviation	
(if different from method sp		J		ated November 14,	2012. LRF # 2
(11 aniarani 11	30011100 11. 1. 1. 7	ļ		was not consistent	
			every mon	th to determine it	s operational and
		l		condition, as well	
O Docco- for Doviction o		Action Taken	· · · · · · · · · · · · · · · · · · ·	s and written reco	rds maintained
	and Description of Corrective ated December 28, 201			13 For the cales	idar vear 2012 3
months of inspection	ns were missed. Outs	side contra	ctors have	been retained to	assist with LRF No. 2
monthly and quarter					



#### RENEWABLE OPERATING PERMIT **DEVIATION REPORT**

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County Wayne

Source Name Severstal Dearborn, LLC				County _	Wayne	
Source Address 4001	Miller Road			City _Dearborn	<u> </u>	
AQD Source ID (SRN)	A8640 ROP No	lo. <u>19</u>	9700004	ROP Sect	ion No. <u>1</u>	
ROP Section Contact	ROP Section Contact James E. Ear1 Contact Phone No. (313) 845-3217					
Reporting Period (provide	Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12					
Report Type: 🛛 Annual 🖾 Semi Annual 🔲 Other (Describe)						
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously reported ? ⊠Yes □ No	5. Duration of Deviation	
EGNO1LRF	E-01.05, III.A.3.6	1/1/12 to 8/31/12 as in NOV	s alleged	12/28/12 and 2/7/13 NOV Response letters	8 months in 2012 alleged in NOV	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description Per NOV difailure to the section of				7. Description of Deviation Per NOV dated November 14, 2012, re: Alleged Eailure to properly operate and maintain bag leak detectors, and keep records of corrective actions for bag leak detectors at No. 1 LRF baghouse		
	and Description of Corrective ystem is meeting perm 3.		)	e NOV responses dated	d December 28, 2012	
1, Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01.11, III.A.3.6	1/1/12 to	Occurrence s alleged	4. Previously reported?  Yes No 12/28/12 and 2/7/13 NOV Response letters	5. Duration of Deviation 8 months in 2012 alleged in NOV	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated November 14, 2012, re: Alleged failure to properly operate and maintain bag leak detectors, and keep records of corrective actions for bag leak detectors at No. 2 LRF baghouse.						
	and Description of Corrective ystem is meeting perm			NOV responses dated	December 28, 2012	



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County Wayne

Source Address 4001	Miller Road	City _Dearborn	<u>n</u>			
AQD Source ID (SRN)	A8640 ROP N	ROP Secti	ion No. 1			
ROP Section Contact	James E. Earl			Contact Phone No.	(313) 845-3217	
Reporting Period (provide	inclusive dates): From	n 01/01/1	2	to <u>12/31/1</u>	2	
Report Type: 🛛 Annual 🖾 Semi Annual 🔲 Other (Describe)						
1. Group or Source Wide ID EGNO1LRF E-01.05 II.B.4.1 January September			Currence  4. Previously reported?  Yes  No  If Yes, Date  12/28/12 and 2/7/13 NOV  Response letters  5. Duration of Devia			
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Particulate Stack testing results at EGNO1LRF were above the 0.005 gr./dscf limit.						
See NOV response dat inspect the baghouse	and Description of Corrective ted December 28, 2012 e. This inspection i house. Follow-up sta	2. After t identified	he stack to some faile	ed bags and some incom	rrectly installed	
Source Wide ID E-01.11 II.B.1.		3. Date(s) of	## Occurrence   4. Previously reported ?   5. Duration of Devia			
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Particulate stack testing results at EGLADLEREFINE2 were above the 3.03 pounds per hour limit, as well as the 0.01 gr/dscf MACT limit.						
See NOV responses da inspect the baghouse	and Description of Corrective ated December 28, 201 e. This inspection i tely corrected. Follo	12. After t identified	he stack to some faile	ed bags in LRF # 2 bag	ghouse. The	



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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AQD Source ID (SRN)	A8640 ROP N	o. <u>199</u>	700004	ROP Section No. 1		
ROP Section Contact	James E. Earl			Contact Phone No	(313) 845-3217	
Reporting Period (provide	inclusive dates): From	01/01/1	2	to 12/31/1	2	
Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe)						
		_				
1. Group or Source Wide ID EGNO1LRF	2. Condition No. E-01.05.V.1 and 2	3. Date(s) of January to September	<b>)</b>	4. Previously reported?  ⊠Yes □ No  If Yes, Date12/28/12  and 2/7/13 NOV  Response letters	5. Duration of Deviation 9 months	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV, failure to properly install, operate and maintain baghouse based on failed stack testing.						
8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated December 28, 2012 and February 7, 2013. Repairs made after July stack test and follow-up stack test conducted September 25-27, 2012 met emission limit. Estimated start date of January is conservative because the last stack test was done in December of 2011 and all emission limits were met at that time.						
·				,		
1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01.11.V.2	3. Date(s) of Occurrence May to September 2012		4. Previously reported?  ☐ Yes ☐ No If Yes, Date 12/28/12 and 2/7/13 NOV Response letters	5. Duration of Deviation 5 months	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV, Failure to properly install, operate and maintain baghouse based on failed stack testing.						
See NOV responses da and follow-up stack date of May is conse	test conducted Septe	.2 and Febr ember 25-27 e replaced	uary 7, 20 , 2012 met	13. Repairs made afte emission limit. The a result of a bag lea	estimated start	

Source Name Severstal Dearborn, LLC

Source Address 4001 Miller Road

County Wayne

City Dearborn



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Source Name Severstal Dearborn, LLC						Wayne		
Source Address 4001	Miller Road			City	Dearbor	n		
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004		ROP Sect	ion No. <u>1</u>		
ROP Section Contact	ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217							
Reporting Period (provide inclusive dates): From 01/01/12 to 12/31/12								
Report Type: 🛛 Annua	l ⊠ Semi Annual □ O	ther (Describe	e)					
1. Group or Source Wide ID EGNO1LRF EGLADLEREFINE2	2. Condition No. E-01.11.IV.2	3. Date(s) of Dates dev reports f		4. Previously (	□ No	5. Duration of Deviation Since filing of allegedly incomplete deviation reports		
6. Method Used to Determ (if different from method s			Per NOV, missing i and maint	nspections, ain bag leak	failure ( detector	viations for to properly operate r and not locating tection response.		
8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated December 28, 2012 and February 7, 2013. Severstal has hired an outside consultant to assist with preparing deviation reports and in identifying and verifying compliance issues. Bag leak detector alarm responses have been located and going forward will be made more readily available for inspection.								
1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01.11 III.A.3.11	3. Date(s) of	Occurrence 12/31/12	4. Previously r □Yes	reported ?	5. Duration of Deviation 6 months		

6. Method Used to Determine Compliance Status

(if different from method specified in ROP)

The LRF #1 compressed air pressure is continuously measured and recorded. Because the baghouse for LRF #2 is near the baghouse for LRF #1, it was incorrectly understood that this would be the same for both units. A pressure gage has been installed and the compressed air pressure is now being recorded separately for LRF #2 baghouse.

basis.

7. Description of Deviation

The LRF #2 compressed air pressure was not confirmed to be operating properly on a daily

<sup>8.</sup> Reason for Deviation and Description of Corrective Action Taken



## RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC					County _1	Wayne
Source Address 4001	Miller Road			City	Dearborn	n
AQD Source ID (SRN)	A8640 ROP No	o. <u>19</u> 9	9700004		ROP Secti	ion No. 1
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	n <u>01/01/1</u>	2	to	12/31/1	2
Report Type: Annual	l ⊠ Semi Annual □ Ol	Other (Describe	;)			
1. Group or	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously r		5. Duration of Deviation
Source Wide ID EGLADLEREFINE2	E-01.11 VI.2	Jun 3,12,	13	∏Yes If Yes, Dat	⊠ No te	3 days
6. Method Used to De (if different from m	tatus (OP)	7. Description of Deviation Daily monitoring of cleaning cycles is done by the PLC. Records are missing for the dates indicated.				
8. Reason for Deviation and Description of Corrective Action Taken Data trending information incomplete. Cleaning cycles are monitored, no evidence of any problem with the bag cleaning systems. Severstal is investigating PLC and data retention issues.						
1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01-11 III.B.3.5	3. Date(s) of	f Occurrence	4. Previously r □Yes	reported ?  No	5. Duration of Deviation  1 day
6. Method Used to Determ (if different from method sp			No correct	on of Deviation tive action om bag leak d		n in response to an
Every other alarm wa	and Description of Corrective as responded to correction for every alarm	ectly. The		have been r	etrained	to respond and
1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01.11 VI.2.	3. Date(s) of weeks of 6 7/22/12 ar 8/19/12	ind	4. Previously r □Yes	reported ?	5. Duration of Deviation 3 weeks in 2012
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  Records confirming that the dust is being removed from hoppers during the week noted were not located.						
8. Reason for Deviation a Inspection records f week in each case.	and Description of Corrective for the weeks noted w	Action Taken vere not lo	cated. Tw	o inspection	ıs were do	one the following



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Severs	Source Name Severstal Dearborn, LLC					Wayne
Source Address 4001	Miller Road			City	Dearbor	n
AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004		ROP Secti	on No. <u>1</u>
ROP Section Contact	James E. Earl			Contact P	hone No.	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual 🔲 Semi Annual 🔲 Other (Describe)						
1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. E-01.11 V.1. E-01.11 V.2. E-01.11 VI.2.	3. Date(s) o	Occurrence	4. Previously r ☐Yes	eported ?	5. Duration of Deviation 12 months
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation  Documentation of a number of inspections required by Iron and Steel MACT has not been located. Some missing inspections, noted in the deviations on pages 29 and 30.						
Unable to document collecting the data	and Description of Corrective compliance with these required. On a goir iewed, revised and er	e requireme ng-forward	nts at thi			
1. Group or Source Wide ID Source Wide	2. Condition No. B.1 II.B	3. Date(s) of 11/15/12 11/16/12	Occurrence and	4. Previously r ☐Yes If Yes, Date	eported ?	5. Duration of Deviation 119 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation 20% opacity was exceeded for 85minutes on 11/15/12 from beaching of iron and for 34 minutes on 11/16/12 from subsequent handling of beached iron outside NE of BOF						
Emissions resulted of the C Blast Furn	nd Description of Corrective from beaching of iron ace after an extended igging beached iron i	n and diggi 1 outage. T	ng of beac rials are	being perfor	ociated wing	with the start-up g Dust Bosses when



#### RENEWABLE OPERATING PERMIT **DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

County Wayne

Dearborn

City

Source Address 4001	Miller Road			City _Dearborn	1	
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u> 9	9700004	ROP Secti	on No. <u>1</u>	
ROP Section Contact	James E. Earl		-	Contact Phone No	(313) 845-3217	
Reporting Period (provide	inclusive dates): From	01/01/1	2	to 12/31/1	2	
Report Type: 🛛 Annual	Semi Annual □ O	ther (Describe	)			
			_			
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported? ☐ No	5. Duration of Deviation	
Source Wide ID Source Wide	B.1 II.B	9/5/12		10/5/12 and 11/16/12 NOV	20 minutes	
		_		responses		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Per NOV dated September 13, 2012: 29% was the highest 3-min average opacity, recorded twice during the time of observation.					, recorded twice	
8. Reason for Deviation and Description of Corrective Action Taken See NOV responses dated October 5, 2012 and November 16, 2012. Due to upset conditions at the continuous caster, the slag contractor was handling beached iron, not desulf slag, at the time of the alleged violation. Trials are being performed using Dust Bosses when digging beached iron in order to minimize emissions.						
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported?	5. Duration of Deviation	
Source Wide ID Source Wide	General Conditions 7(b)	September 29, 2012	9 and	⊠Yes □ No 12/21/13 NOV Response Letter	2 days	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Particulate fallout attributed to either Severstal or Levy on September 9 and 29, 2012.						
See NOV response date to have possibly been severstal is now do: alleged on September Camera recordings sl	en related to handlir ing trial operations r 29 was possibly due how the operator was	2. The Septing of mater using Dusting to a procepouring the second contract of the second c	ember 9 al ial that re Bosses whe edure erro e slag fro	leged fallout incider esulted from beaching en handling beached in while dumping a deam a height higher that using proper pour he	g of molten iron. iron. The fallout sulf slag pot. an normal. The	

for the desulf slaq.



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Source Nameseverst		County Wayne				
Source Address 4001	Miller Road			City	Dearborn	n
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004		ROP Secti	ion No. 1
ROP Section Contact	James E. Earl			Contact P	hone No.	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual	Semi Annual 🔲 C	ther (Describe	9)			
1. Group or Source Wide ID EGRAWMATERIALHANDL ING	2. Condition No. E-01.10 III.A.2.1	3. Date(s) of		4. Previously r □Yes If Yes, Dat	⊠ No	5. Duration of Deviation 26 readings
	etermine Compliance s method specified in F		Pressure and 8 inc	ption of Dev drop across hes w.c. wit ce activity.	baghouse hout init	was not between 5 tiation of
This deviation was v baghouse differentia District supervisor	nd Description of Corrective voluntary disclosed a lal pressure is less to was sent on March 20 hes w.c. This range boublic comment.	as an envir than 5 inch ), 2009 to	conmental a es. As al request a	lowed in the change to the	ROP, a li ne pressu	letter to the re drop range to
-						
1. Group or Source Wide ID EGCOKESCREENBLDGDD	2. Condition No. E-01.17 III.A.2.1	3. Date(s) of	Occurrence	4. Previously r □Yes If Yes, Dat	⊠ No	5. Duration of Deviation  1 month
	etermine Compliance s method specified in F			ption of Dev e monthly VE		tion
The monthly VE form	nd Description of Corrective was incomplete. Visitaneous reading. The	ible emissi	on observa			



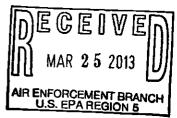
## RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Source Name Severstal Dearborn, LLC					County _1	Wayne
Source Address 4001	Miller Road	_		City	Dearborn	<u>1</u>
AQD Source ID (SRN)	A8640 ROP N	o. <u>19</u>	9700004		ROP Secti	on No. 1
ROP Section Contact	James E. Earl			Contact P	hone No	(313) 845-3217
Reporting Period (provide	inclusive dates): From	01/01/1	2	to	12/31/1	2
Report Type: 🛛 Annual	🛮 Semi Annual 🔲 O	ther (Describe	e)			
						La Davida (Davida
Group or Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously r □Yes	eported?	5. Duration of Deviation
EGTREADWELLCAR E-01.16.III.A.3		October		If Yes, Date	<b>2</b> 4 .10	1 month
	6. Method Used to Determine Compliance Status 7. Description of Deviation 6. Missing monthly visible emission reading 7. Description of Deviation 7. Description of Deviation 7. Description of Deviation 8. Missing monthly visible emission reading 8. Missing monthly visible 9. Missing monthly 0. Missing monthl					
October VE form is n	nd Description of Corrective not completed, howeve aken on 9/24 may have	r, two doc	umented VE		n Septemb	per. The second
					_	
1. Group or	2. Condition No.	3. Date(s) of		4. Previously r ☐Yes	eported?	5. Duration of Deviation
Source Wide ID Source Wide	B-1 IV. 4.	Beginning of the fo		l ∐Yes If Yes, Date	<b>⊠</b> 140	Three 12 day
	B-1.V. & App 1.9	12 day pe				intervals
	B.2	8/1/12, 9 10/1/12	/1/12,			
6. Method Used to Determ	ine Compliance Status	10, 1, 11	7. Description	n of Deviation		
(if different from method sp	pecified in ROP)					ments for 12 day s on unpaved roads
August dust suppress	nd Description of Corrective	HI-Lo rep	air area,			



# RENEWABLE OPERATING PERMIT REPORT CERTIFICATION



Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request. Source Name Severstal Dearborn, LLC County Wayne Source Address 4001 Miller Road City Dearborn AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1 Please check the appropriate box(es): Annual Compliance Certification (Pursuant to Rule 213(4)(c)) Reporting period (provide inclusive dates): Tα 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP. 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s). Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c)) Reporting period (provide inclusive dates): From 01/01/12 Τo 06/30/12 1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred. 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s). Other Report Certification Reporting period (provide inclusive dates): From Tα Additional monitoring reports or other applicable documents required by the ROP are attached as described: I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete Bruce L. Black V. P. and General Manager (313) 317-8955 Name of Responsible Official (print or type) Title Phone Number Signature of Responsible Official

<sup>\*</sup> Photocopy this form as needed.





# RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Source Name _ Severstal Dearborn, LLC						Wayne
Source Address 4001	Miller Road			City	Dearbor	'n
AQD Source ID (SRN)	A8640 ROP No. 199700004				ROP Sec	tion No. 1
ROP Section Contact	Section Contact James E. Earl Contact					(313) 845-3217
Reporting Period (provide	e inclusive dates): Fro	om <u>01/01/</u>	12	to	6/30/12	2
1. Group or	10.0 50					
Source Wide ID FGB&CCASTHOUSE	2. Condition No.	3. Date(s) o	of Occurrence	4. Previously r ☐Yes	eported?	5. Duration of Deviation 6 monthly calculations
6. Method Used to Determ (if different from method s	specified in ROP)		Did not c	on of Deviation alculate PM- VI emissions month from t	by the	anese, arsenic, and end of each
8. Reason for Deviation and Description of Corrective Action Taken The calculations for these emissions no longer apply since Permit 182-05B has newer calculations. Permit 182-05B conditions were included in the most recent ROP application.						
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously re	eported ?	5. Duration of Deviation
Source Wide ID EGRAWMATERIALHANDL ING	III.A.2.1	1/1/12-6/	30/12	Yes If Yes, Dat	No	26 readings
6. Method Used to D	etermine Compliance method specified in	Status ROP)	Pressure of and 8 incl	ption of Devi drop across h hes w.c. and was initiated	oaghouse no appro	was not between 5 opriate maintenance
This deviation was baghouse differenti District supervisor	nd Description of Corrective voluntary disclosed al pressure is less was sent on March 2 hes w.c. This range	as an envir than 5 inch 0, 2009 to	onmental au es. As all	idit finding	on March	etter to the
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously re	ported 2	E Downstian of Downst
Source Wide ID EGBOF	II.B.2	6/27/12	Occurrence	Yes	No No	5. Duration of Deviation 3 minutes
6. Method Used to Determ (if different from method sp	7. Description of Deviation The highest three minute opacity average was 33% from the BOF Roof Monitors.					
Occurred after charg hole. Severstal has	D. Reason for Deviation and Description of Corrective Action Taken Occurred after charging "A" vessel when the vessel was up righted emissions escaped through lance hole. Severstal has hired the contractor that designed the secondary emissions control system to evaluate the system.					



# RENEWABLE OPERATING PERMIT DEVIATION REPORT

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Quality Division, upon reques	st. Items 1 - 8 must be comp	leted for all dev	viations being	reported.		
Source Name Seversta	al Dearborn, LLC				County _W	layne
Source Address 4001 M	iiller Road			City	Dearborn	
	700004		ROP Section	on No. <u>1</u>		
AUD Souice in (Sinty)	A8640 ROP NO			Contact B	tana Na	(313) 845-3217
ROP Section Contact	James E. Earl			Contact F	LUQUE NO	(313) 043 022.
Reporting Period (provide in	nclusive dates): From	01/01/12	?	to	6/30/12	
Report Type:	⊠ Semi Annual □ Ot	ther (Describe)				
1. Group or	2. Condition No.	3. Date(s) of	Occurrence	4. Previously i ☐Yes	reported?	5. Duration of Deviation
Source Wide ID General Condition	2.a	4/13/12		If Yes, Date		24 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute opacity average was 48% from the BOF ESP stack.			
8. Reason for Deviation and Description of Corrective Action Taken Severstal hired TRK Engineering in April and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and are expected to be completed by September 28. The 4/16/12 VE reading was below 20% opacity.						
1. Group or	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously		5. Duration of Deviation
Source Wide ID General Condition	2.a	6/19/12		☐Yes If Yes, Date	⊠ No	18 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation The highest six minute opacity average was 33st from the BOF ESP stack.					y average was 33%	
	and Description of Corrective overed the inlet damped the ESP. The damped			nt #5 was 50 The 6/20/12	% closed o	causing uneven flow ng was below 20%
				<del></del>		T D residence of Douglation
1. Group or	2. Condition No.	3. Date(s) o	of Occurrence	4. Previously ☐Yes		5. Duration of Deviation
Source Wide ID General Condition	2.a	6/25/12		If Yes, Date		30 minutes
6. Method Used to Determ (if different from method s	7. Description of Deviation  The highest six minute opacity average was 29% from the BOF ESP stack.					
	and Description of Corrective covered the inlet dame in the ESP. The damp			nt #5 was 5( The 6/28/12	)% closed 2 VE readi	causing uneven flow ng was below 20%.



## RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC.					y <u>Wayne</u>	
Source Address 4001 Miller Road				City Dearl	b0rn	
AQD Source ID (SRN) A8640 ROP No. 199700004			ROP S	Section No. 1		
ROP Section Contact James E. Earl			Contact Phone No	o. <u>(313)</u> 845-3217		
Reporting Period (provide inclusive dates): From 01/01/12			to	0/12		
Report Type: Annual Semi Annual Other (Describe)						
1. Group or	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously reported		
Source Wide ID General Condition	2.a	6/27/12		☐Yes ☒ N If Yes, Date	24 minutes	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation The highest six minute opacity average was 34% from the BOF ESP stack.					city average was 34%	
8. Reason for Deviation and Description of Corrective Action Taken On 6/28 it was discovered the inlet damper to ESP compartment #5 was 50% closed causing uneven flow distribution through the ESP. The damper was fully opened. The 6/28/12 VE reading was below 20% opacity.						
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously reported  ☐Yes		
EGBOF	II.B.2	6/27/12		If Yes, Date	9 minutes	
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation The highest three minute Opacity average was 3 from the BOF Roof Monitors.						
8. Reason for Deviation and Description of Corrective Action Taken It appears this occurred during the desulf process where some emissions were not being captured by the hood. Investigation did not show any abnormal circumstances that could have led to these emissions.						
It appears this Occi the hood. Investiga	urred during the desu	lf process	where some			
It appears this occurrence the hood. Investigations.	urred during the desu ation did not show an	alf process ny abnormal	where some circumstan	nces that could h	ave led to these	
It appears this occurrence the hood. Investigation in the second in the	urred during the desu	alf process ny abnormal	where some	nces that could ha	ave led to these  1? 5. Duration of Deviation	
It appears this occurrence the hood. Investigations.	urred during the desu ation did not show an	alf process ny abnormal	where some circumstan	4. Previously reported	ave led to these	
It appears this occurrence the hood. Investigation in the hood. Investigation is a second control of the hood. Investigation is a second control of the hood  Investigation of the hood of	urred during the desu ation did not show an 2. Condition No. 2.a	3. Date(s) of 4/13/12	7. Description The higher from the dated 6/5	4. Previously reported  Yes   If Yes, Date 6/5/12  on of Deviation st six minute opa	3? 5. Duration of Deviation No 6 minutes  city average was 50% e Our letter to MDEQ	



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC					Wayne		
Source Address 4001 Miller Road City Dearborn							
AQD Source ID (SRN)         A8640         ROP No.         199700004         ROP Section No.         1							
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217							
Reporting Period (provide inclusive dates): From 01/01/12 to 06/30/12							
Report Type: Annual Semi Annual Other (Describe)							
1. Group or Source Wide ID General Condition	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported?  ☑ Yes □ No If Yes, Date 6/5/12	5. Duration of Deviation 6 minutes		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation The highest six minute opacity average was 34% from the BOF ESP stack. See our letter to MDEQ dated 6/5/2012 for details.					y average was 34% ur letter to MDEQ		
8. Reason for Deviation and Description of Corrective Action Taken Severstal hired TRK Engineering in April and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and are expected to be completed by September 28. The 5/7/12 VE reading was below 20% opacity.							
			_		T		
Group or     Source Wide ID	2. Condition No.	3. Date(s) of 5/8/12, 5		4. Previously reported ? ☐Yes ☑ No	5. Duration of Deviation		
EGNO1LRF	III.A.2	6/5/12, 6		If Yes, Date	4 weekly readings		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation Pressure drop across baghouse filter was above the normal range of 9 inches.							
8. Reason for Deviation and Description of Corrective Action Taken							
Baghouse operation was observed and it was determined no maintenance activity was required.							
1. Group or Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported?  Yes No If Yes, Date	5. Duration of Deviation		
6. Method Used to Determine Compliance Status (if different from method specified in ROP)  7. Description of Deviation							
8. Reason for Deviation and Description of Corrective Action Taken							



## RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Quality Division, upon request. Items 1 - 6 must be completed for all deviations being reported.						
Source Name Severstal Dearborn, LLC					Wayne	
Source Address 4001 Miller Road City				City _ Dearborn	<u>n</u>	
AQD Source ID (SRN)A8640 ROP No				ROP Secti	ion No. 1	
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217						
Reporting Period (provide inclusive dates): From 01/01/12 to 06/30/12						
Report Type: Annual Semi Annual Other (Describe)						
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	f Occurrence	4. Previously reported? ⊠Yes □ No	5. Duration of Deviation	
General Condition	2.a	3/19/12		If Yes, Date 4/26/12	6 minutes	
6. Method Used to Determine Compliance Status  (if different from method specified in ROP)  The highest six minute opacity average was 34% from the BOF, B Vessel. See our letter to MDEQ dated 4/26/2012 for details.						
8. Reason for Deviation and Description of Corrective Action Taken Emissions were from "B" vessel relief damper due to a leaking guillotine. The 3/21/12 VE reading was below 20%.						
Group or     Source Wide ID	2. Condition No.	3. Date(s) of Occurrence		4. Previously reported ? ⊠Yes □ No	5. Duration of Deviation	
General Condition	2.a	3/19/12		If Yes, Date 4/26/12	18 minutes	
6. Method Used to Determine Compliance Status 7. Description of Deviation						
(if different from method specified in ROP)			The highest six minute opacity average was 49% from the BOF ESP stack. See our letter to MDEQ dated 4/26/2012.			
8. Reason for Deviation and Description of Corrective Action Taken Severstal hired TRK Engineering in April and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and are expected to be						



### RENEWABLE OPERATING PERMIT DEVIATION REPORT

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Source Name Severstal Dearborn, LLC County Wayne					Mayne	
Source Address 4001	Miller Road			City Dearborn		
AQD Source ID (SRN)	A8640 ROP N	lo. <u>19</u>	9700004	ROP Secti	on No. <u>1</u>	
ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217						
Reporting Period (provide inclusive dates): From 01/01/12 to 06/30/12						
Report Type: Annual Semi Annual Other (Describe)						
Group or     Source Wide ID	2. Condition No.	3. Date(s) of	Occurrence	4. Previously reported ?  ⊠ Yes □ No	5. Duration of Deviation	
General Condition	2.a	5/6/12		If Yes, Date 6/5/12	6 minutes	
6. Method Used to Determ (if different from method sp			7. Description of Deviation The highest six minute opacity average was 44%. See our letter to MDEQ dated 6/5/2012.			
8. Reason for Deviation and Description of Corrective Action Taken Severstal hired TRK Engineering in April and they performed an interior inspection of the ESP on June 13. This inspection resulted in repairs that began on July 23, 2012 and are expected to be completed by September 28. The 5/7/12 VE reading was below 20% opacity.						
1. Group or Source Wide ID General Condition	2. Condition No.	3. Date(s) of 5/6/12	Occurrence	4. Previously reported?  ☑ Yes ☐ No If Yes, Date 6/5/12	<ul><li>5. Duration of Deviation</li><li>6 minutes</li></ul>	
Method Used to Determine Compliance Status     (if different from method specified in ROP)			7. Description of Deviation The highest six minute opacity average was 32.5% from the BOF Roof Monitors. See our letter to MDEQ dated 6/5/2012 for details.			
8. Reason for Deviation and Description of Corrective Action Taken Roof emissions likely the result of an unusual level of slopping that took place during a heat at the desulfurization (desulf) station. Corrective action was the installation of a camera monitor in the desulf station pulpit so operators can immediately become aware of any releases at the desulf station that reach the roof monitors, and the event can be properly documented and addressed						



to prevent future occurrences. The 5/8/12 VE reading was below 20% opacity.